

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

In re:)	
)	
ANDREW JASON DOPPELT,)	Case No. 16-20669 drd7
)	
Debtor.)	
<hr style="width: 35%; margin-left: 0;"/>)	
)	
Andrew Jason Doppelt,)	
)	
Plaintiff,)	Adversary Proceeding No. 16-02017-drd
vs.)	
)	
ReliaMax Surety Company,)	
)	
Defendant.)	

SECOND MOTION TO AMEND COMPLAINT

COMES NOW the plaintiff, Andrew Jason Doppelt, by and through his undersigned counsel, and for his Second Motion to Amend Complaint, states and avers the following:

1. Plaintiff wishes to amend and correct an errors in the First Amended Complaint concerning the standard of proof applicable to this case (Plaintiff's counsel mistakenly cited a case that has been overruled), and to correct grammatical and typographical errors, without otherwise changing the elements of Plaintiff's case or the relief sought.

2. This proposed amendment should not result in any delay of this case; and Defendant's counsel has given his consent to this proposed amendment..

3. Plaintiff has concurrently filed his proposed Second Amended Complaint, subject to approval by the Court.

WHEREFORE, Plaintiff prays that this Court enter an Order granting him leave to amend

his complaint, as aforesaid, and for such other Orders as the Court shall deem meet and just in the premises.

BOUL & ASSOCIATES, P.C.

Dated: December 8, 2016

/s/ Harry D. Boul
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ANDREW JASON DOPPELT